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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Jacqueline Garcia,

Plaintiff,

v.

Eric S. Cohan, Stephanie Syptak-Ramnath,
Antony Blinken,

Defendants.

Case No: 2:23-cv-00849-CDS-VCF

**Unopposed Motion for Extension of
Time**

(Second Request)

The Federal Defendants respectfully move for a 30-day extension of time, from September 5, 2023, to October 5, 2023, to file a response to Plaintiff's Complaint (ECF No. 1). This is the second request for an extension of time. Undersigned defense counsel has inquired with Plaintiff's counsel, who has no objection to this request for an extension of time.

MEMORANDUM OF POINTS AND AUTHORITIES

Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to request additional time to perform an act. In this case, the Federal Defendants request additional time to file a response to the Complaint for the reasons set forth below.

Without admission or waiver by the parties, there have been recent developments at the agency level, and the parties desire additional time to assess such developments in general and relative to the existing complaint in this matter. This motion is filed in good faith and

1 not for the purposes of undue delay. Accordingly, Federal Defendants respectfully request,
2 and Plaintiff's counsel does not oppose, this extension of time, from September 5, 2023, to
3 October 5, 2023, to file a response to Plaintiff's Complaint.

4 Respectfully submitted this 30th day of August 2023.

5 JASON M. FRIERSON
6 United States Attorney

7 /s/ Patrick A. Rose
8 PATRICK A. ROSE
9 Assistant United States Attorney

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11 **IT IS SO ORDERED**

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13 **UNITED STATES MAGISTRATE JUDGE**

14 **DATED:** 9-6-2023